

PR#9833

PHILLIPS, SHANON

4/15/2009

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OKLAHOMA
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4 STATE OF OKLAHOMA, et al.,
5 Plaintiff,

6 vs. CASE NO. 05-CV-00329-GKF SAJ

7 TYSON FOODS, INC., et al.,
8 Defendants.

9 DEPOSITION OF SHANON PHILLIPS
10 TAKEN ON BEHALF OF THE DEFENDANTS
11 ON APRIL 15, 2009, BEGINNING AT 9:00 A.M.
12 IN OKLAHOMA CITY, OKLAHOMA

13 APPEARANCES:

14 On behalf of the PLAINTIFF:

15 Mr. J. Trevor Hammons
16 Mr. Dan Lennington
17 OKLAHOMA ATTORNEY GENERAL'S OFFICE
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19 Oklahoma City, Oklahoma 73105
20 (405) 522-2801
21 thammons@oag.state.ok.us

22 On behalf of the DEFENDANT-CARGILL, INC. AND CARGILL
23 TURKEY PRODUCTION:

24 Ms. Theresa Hill
25 RHODES, HIERONYMUS, JONES, TUCKER & GABLE
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Also Present: Ms. Janet Stewart
Mr. Jim Leach

REPORTED BY: Laura L. Robertson, CSR, RPR

EXHIBIT

4-11

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1 in the Illinois River Watershed.

2 Q. All right. Please take a look at topic
3 number 3 and advise me whether you are prepared to
4 testify on behalf of Oklahoma Conservation Commission
5 about topic 3 of this notice?

6 A. I'm prepared to discuss costs and response
7 costs incurred by the Oklahoma Conservation Commission
8 in response to pollutants that have affected water
9 quality in the Illinois River Watershed.

10 Q. Take a look at topic 4 and please advise
11 whether you are prepared to testify as to topic 4 on
12 behalf of the Oklahoma Conservation Commission?

13 A. We do not have the ability to relate costs
14 specifically to each of the defendants or their
15 contract growers, our costs are not tracked that way.

16 Q. So are you prepared to testify as to topic
17 4?

18 A. Yes.

19 Q. We will explore in more detail as we go
20 through the deposition.

21 You advised that you do not have the ability
22 to relate costs to a specific defendant. Do you
23 relate costs to the release of any pollutant or
24 hazardous substance released from defendants
25 generally, not specifically?